

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

COMPASS MARKETING, INC.,

Plaintiff,

v.

FLYWHEEL DIGITAL LLC, *et al.*,

Defendants.

Case Number: 1:22-cv-00379-JKB

\* \* \* \* \*

**MOTION TO DISMISS BY DEFENDANTS FLYWHEEL DIGITAL LLC, JAMES  
COLUMBUS DIPaula JR., PATRICK MILLER AND ASCENTIAL PLC**

Defendants Flywheel Digital LLC, James Columbus (“Chip”) DiPaula, Jr., Patrick Miller (the “Flywheel Defendants”) and Ascential plc respectfully move this Court for an Order dismissing with prejudice Plaintiff’s Complaint and all claims asserted therein against the Flywheel Defendants and Ascential, and granting such other and further relief as the Court may deem just and proper. In support of their Motion to Dismiss, the Flywheel Defendants and Ascential incorporate herein the facts and arguments set forth in their Memorandum of Law in Support of Motion to Dismiss by Flywheel Digital LLC, James Columbus “Chip” DiPaula, Jr., Patrick Miller, and Ascential plc, as well as the accompanying Declaration of G. Stewart Webb, Jr., with attached exhibits, dated April 4, 2022. Additionally, pursuant to Local Rule 105.6, the Flywheel Defendants and Ascential respectfully request oral argument on their Motion to Dismiss.

A proposed order granting the relief requested herein is attached.

Dated: April 4, 2022  
Baltimore, Maryland

By:           /s/          G. Stewart Webb, Jr.          

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*Attorneys for the Flywheel Defendants and Ascential*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 4, 2022, I caused the foregoing Motion to Dismiss Plaintiff's Complaint, a supporting memorandum of law, the supporting Declaration of G. Stewart Webb, Jr., complete with all exhibits thereto, the supporting Declaration of Louise Meads, and a proposed order to be electronically filed with the Clerk of the Court and served on all counsel of record via the CM/ECF filing system. I FURTHER CERTIFY that as-filed courtesy copies of the foregoing papers will be delivered to the Clerk's office within 48 business hours of filing.

/s/ G. Stewart Webb, Jr.

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G. Stewart Webb, Jr. (Bar No. 00828)